COASTAL CONSERVANCY

Staff Recommendation
October 5, 2006

NAVARRO WATERSHED RESTORATION PLAN IMPLEMENTATION, PHASE V

File No. 98-055-06
Project Manager: Moira McEnespy

RECOMMENDED ACTION: Authorization to disburse up to $172,000 to the Mendocino County Resource Conservation District to conduct Mill Creek upslope road sediment reduction and Navarro River watershed monitoring activities, and to implement a watershed awareness signing program, all of which will further implement the *Navarro Watershed Restoration Plan*.

LOCATION: Navarro River watershed, Mendocino County.

PROGRAM CATEGORY: Integrated Coastal and Marine Resources Protection

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EXHIBITS

Exhibit 1: Project Location Map

Exhibit 2: Project Sites Map

Exhibit 3: (a) California Department of Fish and Game Mitigated Negative Declaration for the 2004 Fisheries Restoration Grant Program

(b) Notice of Determination

(c) Statement of Work

(d) CDFG Natural Diversity Database excerpt

(e) Mitigation Measures, Monitoring and Reporting Program

Exhibit 4: Letters of Support

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31000 *et seq.* of the Public Resources Code:

"The State Coastal Conservancy hereby authorizes the disbursement of an amount not to exceed $172,000 (one hundred seventy-two thousand dollars) to the Mendocino County Resource Conservation District to conduct Mill Creek upslope road sediment reduction and Navarro River watershed monitoring activities, and to implement a watershed awareness signing program, all of

which will further implement the *Navarro Watershed Restoration Plan (approved by the Conservancy on August 6, 1999),* subject to the following conditions:

1. Prior to the disbursement of any funds, the Executive Officer of the Conservancy shall approve in writing a work plan, budget and schedule, any contractors or subcontractors to be employed in these tasks, and a signing plan that acknowledges Conservancy funding.
2. The grantee shall implement the applicable requirements of the Negative Declaration and its Mitigation Measures, Monitoring and Reporting Program (attached as Exhibit 3 to the accompanying staff recommendation) adopted on July 7, 2004 by the California Department of Fish and Game for the 2004 Fisheries Restoration Grant Program.
3. The grantee shall submit for approval by the Executive Officer proof of appropriate permits and access agreements sufficient to implement all on-the-ground tasks."

Staff further recommends that the Conservancy adopt the following findings:

"Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed project is consistent with Chapter 5.5 of Division 21 of the Public Resources Code (Section 31220) regarding Integrated Coastal and Marine Resources Protection.
2. The proposed project is consistent with the Project Selection Criteria and Guidelines adopted by the Conservancy on January 24, 2001.
3. The Conservancy has independently reviewed the Mitigated Negative Declaration prepared and adopted by the California Department of Fish and Game ("CDFG") on July 7, 2004, attached to the accompanying staff recommendation as Exhibit 3, and concurs there is no substantial evidence that the project, as mitigated, will have a significant effect on the environment as defined in 14 California Code of Regulations Section 15382.
4. There is no evidence before the Conservancy that the project will have a potentially adverse effect, either individually or cumulatively, on wildlife resources as defined under California Fish and Game Code Section 711.2.
5. The Conservancy has on the basis of substantial evidence rebutted the presumption of adverse effect contained in 14 California Code of Regulations Section 753.5(d) regarding the potential for adverse effect on wildlife resources as defined under California Fish and Game Code Section 711.2."

PROJECT SUMMARY:

Staff recommends that the Conservancy authorize disbursement of up to $172,000 to the Mendocino County Resource Conservation District ("MCRCD") to conduct Mill Creek upslope road sediment reduction and Navarro River watershed monitoring activities, and to implement a watershed awareness signing program, all of which will further implement the *Navarro Watershed Restoration Plan* (jointly published by the Anderson Valley Land Trust ("AVLT"), the Mendocino County Water Agency ("MCWA") and the Conservancy in June 1998, with funding from the Conservancy and the North Coast Regional Water Quality Control Board ("RWQCB"); adopted by the Conservancy on August 6, 1999).

The *Navarro Watershed Restoration Plan* has served as the guiding document to implement restoration projects in the Navarro basin since 1999. Now in its fifth season, the Navarro Watershed Restoration Program has approximately three million dollars in the funding pipeline, and is seeking matching Conservancy funds to conduct three additional restoration projects.

The Mill Creek upslope road sediment reduction project is being conducted in the lower Navarro River sub-watershed (see Exhibit 2). This project will reduce road-related erosion, which the *Navarro Watershed Restoration Plan* identifies as a priority restoration action in the mainstem Navarro drainage basin, which contains Mill Creek. This project will upgrade approximately 26 sites along approximately six miles of the Holmes Ranch Road system, which includes approximately 32,000 feet of road segments and 10 stream crossings, to prevent 18,164 cubic yards of sediment from entering the river system. Specifically, the project will:

- Install or replace at least five culverts with those sized for 100-year storm events to allow fish passage; clean at least one culvert and clean and/or treat at least four inlets/outlets; excavate at least one stream crossing, and treat perched fills; minimize diversion and erosion potential at culverts and stream crossings; and install critical dips at crossings.
- Outslope road and remove outboard berm, fill in-board ditch, install rolling and critical dips, and/or rock road surfaces along approximately 32,000 feet of road.
- Develop a final report that can be used to develop proposals for further implementation projects.

These road segments have been assessed by Pacific Watershed Associates ("PWA") as areas of particular concern due to the amount of sediment they deliver annually into the Mill Creek system. This project will implement the PWA Mill Creek Roads Assessment, funded by the California Department of Fish and Game ("CDFG"), continue road upgrades that were recommended in the *Navarro Watershed Restoration Plan (1998)* and previously funded through CDFG, and implement CDFG's *Recovery Strategy for California Coho Salmon* high priority tasks MC-HU-11 (treat existing upslope sediment sources to improve pool frequency and depth) and MC-HU-22 (develop erosion control projects). The MCRCD started work with CDFG funding in June 2005 and anticipates completing work by June 2007.

The Navarro River watershed winter monitoring program, Phase II, will be conducted on three tributaries also located in the lower Navarro River sub-watershed (see Exhibit 2): North Fork Navarro at Highway 128, Flynn Creek at Highway 128, and Mill Creek at Nash-Mill Bridge. This project will continue for two more winters (winter 06/07 and winter 07/08) a restoration effectiveness-monitoring program developed by the Mendocino County Water Agency ("MCWA") and UC Davis, with Conservancy and MCWA funding. The program covered most of the first winter (2004-2005) and all of the second winter (2005-2006), and will end in Spring 2006 unless additionally funded. Specifically, the program will:

- Measure flows at the three stations during up to 10 storm events.
- Collect water samples to measure turbidity, suspended sediment concentration, and bedload sediment.
- Develop rating curves for each station, analyzing and graphing data; contract with USGS to run bedload sediment samples, and with UC Davis to analyze bedload sediment.
- Conduct up to four spawning surveys in each stream each winter.

- Prepare a Final Report.

The monitoring program is necessary to ensure implementation projects identified in the *Navarro Watershed Restoration Plan* are having the desired effects of improving water quality and increasing fish populations.

The Navarro River watershed awareness signing program seeks to promote watershed awareness by designing and installing public roadway and other signs to indicate watershed boundaries (approximately 18 signs) and potentially hazardous river/beach conditions (two signs). Consistent with the "Education and Public Information" section of the *Navarro Watershed Restoration Plan*, the signing program will help residents and visitors become more aware of and conversant in Navarro watershed concepts and issues. The MCRCD will work collaboratively with the local Navarro watershed group, and MCWA, County, Caltrans and Conservancy staff to implement the program.

Site Description: The Navarro River and its major tributaries, Rancheria, Indian, and Anderson Creeks, drain the largest watershed located completely in Mendocino County (an area of 315 square miles), and the Navarro River itself empties into the Mendocino Coast State Seashore. The Navarro River supports a largely rural economy. Timber harvest, grazing and other agricultural activities have been ongoing in the watershed since the mid-1800s; more recently, orchards, vineyards and tourism have joined the primary economic activities. The watershed is under increasing development pressure as it becomes included in the "greater Bay Area" and as vineyard expansion in the watershed increases. Accordingly, pressure on water supplies and water quality, as well as on the remaining fish habitat, is also increasing as more land is brought into production or developed.

The Navarro River is listed by the State Water Resources Control Board as having impaired and/or threat of impaired water quality by sediment and/or temperature in accordance with Section 303(d) of the federal Clean Water Act. The river supports a much-reduced population of coho salmon, a federally listed species, as well as steelhead, which are threatened in many of northern California's watersheds.

Project History: The Conservancy assisted the AVLT and MCWA to develop the *Navarro Watershed Restoration Plan*, and has granted over $1.2 million to the MCRCD to implement the plan over the last 12 years. Implementation projects have included culvert replacements and erosion/sediment control (Little Mill Creek, Dago Creek), road assessments (Indian Creek, Rancheria Creek, Hendy Woods), bank stabilization and native vegetation replanting (Indian Creek, Anderson Creek, Robinson Creek, Upper Rancheria Creek), invasive vegetation removal (Rancheria Creek sub-watershed), monitoring (lower Navarro sub-watershed), development of workshops and educational materials for landowner education and outreach, testing of a resource center pilot project, and development of a coordinated permit. The proposed projects will continue to implement the *Navarro Watershed Restoration Plan*. Specifically, the Mill Creek upslope road sediment reduction project will reduce road-related erosion, which the *Navarro Watershed Restoration Plan* identifies as a priority restoration action in the mainstem Navarro drainage basin, which contains Mill Creek; the monitoring program is necessary to ensure implementation projects identified in the *Navarro Watershed Restoration Plan* are having the desired effects of improving water quality and increasing fish populations; and the signing program will help residents and visitors become more aware of and conversant in Navarro

watershed concepts and issues, consistent with the "Education and Public Information" section of the *Navarro Watershed Restoration Plan*.

PROJECT FINANCING:

Source	*Mill Creek Sediment Reduction*	*Watershed Monitoring*	*Watershed Awareness Sign Program*	*Total*
Coastal Conservancy	35,400	106,600	30,000	172,000
CDFG	173,259			173,259
Holmes Ranch Road Assn.	31,000			31,000
MCWA (in-kind)		17,400	1,000	18,400
Navarro Watershed Working Group (in-kind)			1,000	1,000
Total Project Cost	239,659	124,000	32,000	395,659

The proposed source of Conservancy funds for this authorization is am appropriation to the Conservancy from Proposition 40, "The California Clean Water, Clean Air, Safe Neighborhood Parks and Coastal Protection Act of 2002." These funds are available for grants to public agencies and nonprofit organizations for restoration and associated planning, permitting and administrative costs, for the protection and restoration of coastal watershed and streams, and were specifically appropriated for the purposed of funding coastal watershed protection projects under Section 31220 of the Public Resources Code.

The proposed project is consistent with Public Resources Code Section 31220, as discussed in the "Consistency with Conservancy's enabling legislation" section of this report, below, and with applicable watershed management and water quality control plans, as discussed in the "Consistency With Local Watershed Management Plan/State Water Quality Control Plan" section of this report, below. The proposed authorization is thus consistent with Proposition 40.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project is consistent with Chapter 5.5 of the Conservancy's enabling legislation (Division 21 of the Public Resources Code, Section 31220) regarding integrated coastal and marine resources protection in the following respects:

Section 31220(a) authorizes the Conservancy to award grants for sediment management and for coastal watershed, habitat and water quality protection and restoration. Consistent with this section, the Conservancy proposes to award a grant to the MCRCD to prevent and/or reduce upslope road sediment from reaching waters in the lower Navarro River sub-watershed, particularly Mill Creek, collect and analyze data to determine the effectiveness of restoration activities, and promote public watershed awareness, thus managing sediment and protecting water quality and habitat within a coastal watershed.

Consistent with subsection 31220(b)(1), the proposed project will prevent and/or reduce contamination of waters within the coastal zone, most notably sediment for which the Navarro River is listed by the State Water Resources Control Board ("SWRCB") as impaired. Consistent with subsection (b)(2), the proposed project will protect fish (namely coho and other salmonids) and wildlife habitat within a coastal watershed by preventing and/or reducing sedimentation of

coastal streams from existing upslope roads, collecting and analyzing data that will help determine the effectiveness of watershed restoration projects, and promoting public watershed awareness. Consistent with subsection (b)(3), the proposed project will reduce threats to coastal and marine fish (again, coho and other salmonids) and wildlife, largely through preventing and/or reducing sediment loads from existing upslope roads to streams in a coastal watershed. Consistent with subsection (b)(4), the proposed project will reduce and even prevent unnatural erosion and sedimentation of a coastal watershed by upgrading 6.0 miles of existing upslope roads.

In accordance with Subsection 31220(c), the proposed project is consistent with the Integrated Watershed Management Program established under Public Resources Code Section 30947, local watershed management plans, and water quality control plans adopted by the SWRCB. Please see the discussion in the "Consistency with local watershed management plan/state water quality control plan" section of this report, below. Also in accordance with Section 31220(c), the proposed project will consist of (via the Navarro River watershed winter monitoring component) or contain (the Mill Creek upslope road sediment reduction component) a monitoring and evaluation component (random project evaluations conducted by the CDFG). Conservancy staff is also consulting with the State Water Resources Control Board to ensure consistency with Chapter 3 (commencing with Section 30915) of Division 20.4 of the Public Resources Code.

CONSISTENCY WITH CONSERVANCY'S STRATEGIC PLAN GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 5 Objective A** and **Goal 6 Objectives A and B**, the proposed project will preserve and enhance stream corridors, preserve and restore a coastal watershed, and improve water quality by preventing sediment loading to streams from existing road networks, monitoring restoration effectiveness in the lower Navarro River sub-watershed, and promoting public watershed awareness.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines adopted January 24, 2001, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section, above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section, above.
3. **Support of the public:** The proposed project is supported by the public. See letters of support from State Senator Wesley Chesbro and Assemblymember Patty Berg, among others, in Exhibit 4.
4. **Location:** Although the proposed project is not located within the coastal zone, it will prevent or reduce sediment from entering streams in a coastal watershed that empies into the Mendocino Coast State Seashore, collect and analyze data to make determinations about the

effectiveness of restoration projects conducted in a coastal watershed, and promote public awareness about a coastal watershed.

5. **Need:** Although the proposed Mill Creek sediment reduction project has matching State and private funds, it will not be completed at its planned level absent Conservancy participation. Similarly, the Navarro watershed monitoring project will not occur at all absent Conservancy funds, as it only has dedicated in-kind services from MCWA; thus, absent Conservancy funds, the benefit of continued monitoring data (e.g., demonstration of trends, adequate data to make findings about the effectiveness of restoration practices) will be lost. Finally, the watershed awareness signing program has only the commitment of in-kind work by the local watershed group.
6. **Greater-than-local interest:** The Navarro River is a significant north coast stream. It has the largest watershed entirely in Mendocino County, and supports listed species such as coho salmon and steelhead.

Additional Criteria

7. Urgency: The current Navarro watershed monitoring will end Spring 2006 absent further Conservancy participation, thus rendering two years' monitoring data less useful, and lapsing on the collection of data necessary to show trends and make findings about the effectiveness of restoration practices.

12. Readiness: The MCRCD has already begun the Mill Creek sediment reduction work with matching funds, and is poised to continue the ongoing Navarro watershed monitoring work this upcoming winter.

13. Realization of prior Conservancy goals: See "Project History" section, above.

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The Conservancy found the *Navarro Watershed Restoration Plan*, which describes actions that can be taken throughout the watershed to benefit coastal resources, consistent with the Mendocino County Local Coastal Program (certified by the Coastal Commission on September 10, 1992) when it adopted the Plan in August of 1999. The activities proposed in this staff recommendation will continue implementation of the Plan, and will thus be consistent with the certified Local Coastal Program.

CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/ STATE WATER QUALITY CONTROL PLAN:

Under Public Resources Code Section 31220 (c), projects funded under Chapter 5.5 of Division 21, the Conservancy's enabling legislation, must be consistent with the Integrated Watershed Management Program established pursuant to Public Resources Code Section 30947 and local watershed management plans, "if available and relevant to the project." The proposed project is consistent with relevant plans and programs, as described below.

Applicable Regional Water Quality Control Plan. Mandated by both the Federal Clean Water Act and the State Porter-Cologne Water Quality Act, water quality control plans (basin plans) designate beneficial uses of water bodies and identify water quality objectives to ensure reasonable protection of beneficial uses. The beneficial uses, water quality objectives and anti-

degradation policies, together, constitute water quality standards. In 1988, the North Coast Regional Water Quality Control Board (RWQCB) synthesized a single *Water Quality Control Plan for the North Coast Region (Basin Plan)*. This Basin Plan is the applicable regional water quality control plan pursuant to Proposition 50.

Section 303(d) of the Clean Water Act requires states to identify waters that do not meet applicable water quality standards that are largely contained in the Basin Plans. The Navarro River is on the section 303(d) list due to impairment and/or threat of impairment to water quality by sediment and temperature. The U.S. Environmental Protection Agency (EPA) established a TMDL (action plan called "total maximum daily load") for the Navarro River to address sediment and temperature impairments in December 2000, and it was included in the TMDL Implementation Policy for Sediment Impaired Receiving Waters in the North Coast Region (TMDL Implementation Policy, adopted in lieu of amending the Basin Plan to add TMDL implementation strategies) adopted by the RWQCB in November 2004 to address all sediment-impaired water bodies in the North Coast region.

The TMDL Implementation Policy resolves to "enhance non-regulatory actions with organizations and individuals to encourage sediment waste discharge control, watershed restoration and protection activities" (Resolution 1F) and "strongly encourages all landowners within the North Coast Region that are currently discharging or threatening to discharge sediment waste to work to control discharges" (Resolution 2). In the proposed project, the MCRCD will work with landowners to prevent and/or reduce sedimentation of coastal streams from existing upslope roads, will collect and analyze data that will help determine the effectiveness of watershed restoration projects, and will promote public watershed awareness. The proposed project is thus consistent with the TMDL Implementation Policy and the Basin Plan.

Integrated Watershed Management Program established pursuant to PRC Section 30947. The *North Coast Integrated Regional Water Management Plan, Phase I (NCIRWMP*, prepared by *Circuit Rider Productions, July 2005)* was developed pursuant to Public Resources Code Section 30947 (but is not intended to be adopted by the RWQCB). The NCIRWMP identifies six primary integrated water management objectives for the North Coast region, relevant at both the local and regional scale, of which the following two apply to the proposed project: (1) "Conserve and enhance native salmonid populations by protecting and restoring required habitats, water quality and watershed processes;" and (2) "Support implementation of TMDLs, the North Coast RWQCB's Watershed Management Initiative (WMI) and the Nonpoint Source Program Plan." As discussed immediately below, the proposed project is consistent with applicable objectives of the NCIRWMP, and thus with the Integrated Watershed Management Program.

Conservation and Enhancement of Native Salmonid Populations. The proposed project will significantly prevent and/or reduce sedimentation of coastal streams from existing upslope roads, collect and analyze data that will help determine the effectiveness of watershed restoration projects, and promote public watershed awareness, all of which will enhance native salmonid habitat.

Support Implementation of TMDLs. As discussed under the "Applicable Regional Water Quality Control Plan," above, the proposed project supports the TMDL Implementation Policy.

Support the North Coast RWQCB Watershed Management Initiative. A key component of the SWRCB's and the nine RWQCB's 2001 Strategic Plan[1] is a watershed management approach. The Watershed Management Initiative (WMI) is intended to support the Strategic Plan to address the Strategic Plan goal that surface waters be safe to support healthy ecosystems and other beneficial uses. The North Coast RWQCB has developed a *WMI Chapter (February 2005),* a document that identifies regional watersheds, prioritizes water quality issues, and develops watershed management strategies. The WMI Chapter is strictly a regional planning document; it is not intended to be adopted by the RWQCB, nor is it a regulatory document. Among the highest-priority activities identified in the WMI Chapter are increasing emphasis on nonpoint source pollution issues (including roads), especially as they affect salmonid resources, and developing and implementing TMDL strategies (mostly sediment and temperature associated with salmonid resource declines). Furthermore, the section on the Navarro River watershed specifically references the *Navarro Watershed Restoration Plan* in its implementation strategy. The proposed project further implements the *Navarro Watershed Restoration Plan* and consists of preventing and/or reducing sedimentation of coastal streams from existing upslope roads, collecting and analyzing data that will help determine the effectiveness of watershed restoration projects, and promoting public watershed awareness. The proposed project will thus be consistent with the WMI, specifically the North Coast Chapter.

Support the California Nonpoint Source Pollution Control Program. The Plan for California's Nonpoint Source Pollution Control Program (NPS Program Plan) provides a single, unified, coordinated statewide approach to dealing with NPS pollution. The *Plan for California's Nonpoint Source Pollution Control Program (SWRCB and California Coastal Commission (CCC), January 2000)* and the *Five-Year Implementation Plan for July 2003 through June 2008 (SWRCB and CCC in coordination with the Nonpoint Source Interagency Coordination Committee, December 2003)* establish nonpoint source program management measures to be implemented or required by the various State agencies. The "transportation development" management measure applies to existing roads that contribute to adverse effects in surface waters, such as generating significant erosion and sediment loads that threaten the quality of surface waters and their tributaries. The proposed project will prevent and/or reduce sedimentation of coastal streams from existing upslope roads, and is thus consistent with the California Nonpoint Source Pollution Control Program.

Local Watershed Management Plans. The *Navarro Watershed Restoration Plan* has served as the guiding document to implement restoration projects in the Navarro basin since 1999. In the proposed project, the MCRCD will further implement the plan by preventing and/or reducing sedimentation of coastal streams from existing upslope roads, collecting and analyzing data that will help determine the effectiveness of watershed restoration projects, and promoting public watershed awareness. The proposed project is thus consistent with this local watershed management plan.

[1] The Strategic Plan is a continuing agency-wide planning process that articulates the goals, strategies, objectives, and performance measures used to guide ongoing decision-making and help ensure that the mission of the State and Regional Boards is accomplished.

COMPLIANCE WITH CEQA:

The proposed project consists of a data collection and analysis component, a watershed awareness sign program component, and an upslope road sediment prevention and/or reduction component.

The on-the-ground actions associated with the data collection and analysis component consist of measuring stream flows, collecting water samples and conducting fish spawning surveys. These actions constitute basic data collection, research and resource evaluation activities that do not result in a serious or major disturbance to an environmental resource, and thus qualify for a Class 6 (Title 14, Section 15306) categorical exemption from the California Environmental Quality Act ("CEQA").

The on-the-ground actions of the watershed awareness sign program component consist of posting signs within public road rights-of-way and other locations. These actions constitute placement of minor structures (signs) accessory to existing facilities (e.g., public roadways, public beaches), and thus qualify for a Class 11 (Title 14, Section 15311) categorical exemption from CEQA.

The upslope road sediment prevention and/or reduction component is included as the "Mill Creek Upslope Road Sediment Reduction Project" in the Mitigated Negative Declaration ("MND") developed and adopted on July 7, 2004 by the CDFG for projects funded through the FY2004-05 Fisheries Restoration Grant Program (Exhibit 3a). The CDFG found that although the funded projects, including the Mill Creek Upslope Road Sediment Reduction Project that constitutes this proposed project, may have the potential to cause minor short-term impacts on soil, vegetation, wildlife, water quality and aquatic life, the measures that will be incorporated into the projects will lessen such impacts to below a level of significance under CEQA (Exhibit 3a). The CDFG signed a Notice of Determination on July 7, 2004 (Exhibit 3b).

The Statement of Work prepared by the CDFG for the Mill Creek Upslope Road Sediment Reduction Project (Exhibit 3c) defines the project as site-specific erosion control measures to remediate approximately 18,164 cubic yards of potential sediment delivery to streams inhabited by anadromous salmonids. Remediation work will include sediment control upgrades at approximately 26 sites along approximately six miles of road where future sediment delivery has been found likely to occur. Treatment sites will include 10 stream crossings. Sediment remediation work will include culvert installation, culvert replacement at five sites, downspout installation at three sites, culvert cleaning at one site, flared inlet installation at one site, soil excavation at one site, rolling dip installation, wet crossing installation, critical dip installation at six sites, road berm removal, road outsloping, and rocking of road surfaces.

The MND addresses all of the anticipated environmental effects of the funded projects by providing mitigation measures for the various types of projects that would be implemented throughout the State. These measures include use of accepted protocols for avoiding impacts to species of concern known to occur in the general vicinity of the project. The list of State- and Federally-listed threatened and endangered species of concern for the Mill Creek Upslope Road Sediment Reduction Project were generated from the CDFG's Natural Diversity Database (Exhibit 3d). The project will incorporate measures specified in the Mitigation Measures, Monitoring and Reporting Program, attached to the MND as Appendix B (Exhibit 3e), which contains general mitigation measures for the protection of biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, and

noise, as well as project-specific mitigation measures for the protection of biological resources necessary to avoid impacts to species of concern or their habitats. Specific measures applicable to the Mill Creek Upslope Road Sediment Reduction Project include those to protect Coho salmon and the listed birds, as detailed in Exhibit 3e. Other measures required to avoid impacts to resources specifically for the Mill Creek Upslope Road Sediment Reduction Project based on that project's Statement of Work include the following: Work is limited only to sites that area expected to erode and deliver sediment to the stream; treatments and sites may be modified upon approval by the CDFG contract manager for purposes of avoiding environmental impacts or increasing the effectiveness or feasibility of the project; and all road upgrading or decommissioning will be done in accordance with techniques described in the *Handbook for Forest and Ranch Roads (Weaver and Hagans 1994)* or Part X of the *California Salmonid Stream Habitat Restoration Manual (Flosi et al. 1998).*

In addition, as further specified in the Mitigation Measures, Monitoring and Reporting Program, CDFG's project managers will inspect the work sites before, during and after completion of the project to ensure that all necessary mitigation measures to avoid impacts are properly implemented.

Staff concurs with the CDFG finding that with the incorporation of the Mitigation Measures, Monitoring and Reporting Program, implementing the proposed project will have no significant environmental impact. Concurrence is based on independent review of the MND, including the Statement of Work, the Natural Diversity Database listing for the proposed project, and the Mitigation Measures, Monitoring and Reporting Program Staff recommends that the Conservancy find that the Mill Creek Upslope Road Sediment Reduction Project does not have a potential for significant effect on the environment as defined under 14 California Code of Regulations Section 15382, or on wildlife resources, as defined under Fish and Game Code Section 711.2.

Staff will file a Notice of Determination for the Mill Creek Upslope Road Sediment Reduction Project component and a Notices of Exemption for the data collection and analysis and watershed awareness sign program components upon approval.